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August 1, 2023

VIA ECF

The Honorable Magistrate Judge Katharine H. Parker
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Kuan v. Notoriety Group LLC et al*
Case No.: 1:22-cv-01583-MKV

Dear Honorable Judge Parker:

This law firm represents plaintiff Megan Kuan (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Practice Rule I(A), and the directives in Your Honor’s July 21, 2023 Order [Dckt. No. 74], this letter respectfully serves to provide the Court with a status update in the above-referenced action and requests the adjournment of the conference scheduled for August 22, 2023.

On July 31, 2023, the undersigned had a conference call with counsel to the Defendants Notoriety Group LLC (the “Corporate Defendant”), Anthony Shnayderman, Nathan Leong, and Niv Shaked (collectively, the “Individual Defendants”, and together with the Corporate Defendant, the “Defendants”). During the conference call, the counsel to the Defendants stated that he believes that the settlement conference scheduled for August 22, 2023 at 10:30 a.m. would not be productive in settling this case. Given that the undersigned has a one-week vacation scheduled beginning on August 22, 2023 and the Defendants’ settlement position, the Plaintiff respectfully requests the adjournment of the conference scheduled for August 22, 2023.

This letter also requests that the Plaintiffs’ responsive deadline to the Defendants’ Motion to Vacate the Judgment filed on July 19, 2023 [Dckt. Nos. 65,66, and 67] be set for August 21, 2023.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua Levin-Epstein

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